

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

**AIG SPECIALTY INSURANCE  
COMPANY (F/K/A CHARTIS  
SPECIALTY INSURANCE COMPANY),**

**PLAINTIFF,**

**VERSUS**

**KNIGHT OIL TOOLS, INC.,**

**DEFENDANT.**

**\* CIVIL ACTION NO. 6:21-cv-04191**

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**JUDGE ROBERT R. SUMMERHAYS**

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**MAGISTRATE**

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**JUDGE CAROL B. WHITEHURST**

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE**  
**A REPLY TO DOC. 63, AIG'S OPPOSITION TO MOTION TO DISMISS, DOC 42**

NOW INTO COURT, through undersigned counsel, comes Defendant, Knight Oil Tools, Inc. ("Knight"), through undersigned counsel, who respectfully requests a brief extension of time to file a reply to AIG Specialty Insurance Company's Joint Memorandum in Opposition to Ripsey Oil Company's Motion for Abstention and to Dismiss Complaint for Declaratory Judgment or in the alternative Stay or Transfer and In Opposition to Knight Oil Tools, Inc.'s Motion to Dismiss, or in the Alternative, to Stay Proceedings, [R. Doc. 63].

**1.**

Knight's current deadline to file a request for leave to file a reply is Monday, March 16, 2022. The proposed reply is a required attachment to Knight's Motion for Leave.

**2.**

Knight hereby requests that an order be entered approving a brief extension, through May 20, 2022, inclusive, for the filing of a reply to AIG's Opposition.

**3.**

In accordance with Local Rule 7.9, Counsel for Knight contacted Robert I. Siegel, Esq., Counsel for Plaintiff, on May 16, 2022. Counsel for Plaintiff has no opposition to the requested extension sought by this motion.

**4.**

The requested extension will not unduly delay this matter. There is no scheduling order, and an extension will not interfere with the time set for completion of discovery, for hearing a motion, or for trial.

**5.**

Pursuant to Local Rule 7.4.1, no supporting memorandum or hearing is required unless otherwise directed by this Honorable Court.

**6.**

WHEREFORE, Defendant, Knight Oil Tools, Inc., respectfully prays:

- A. That an order be entered granting Defendant, Knight Oil Tools, Inc., an extension through May 20, 2022, inclusive, within which to file a reply to Plaintiff's Opposition; and
- B. For such other and further relief as may be deemed just in the premises.

Respectfully submitted by:

s/Vanessa W. Anseman

Vanessa W. Anseman (Bar No. 28795)

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**Attorney for Knight Oil Tools, Inc.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 16th day of May 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel registered for electronic service. I further certify that I have served a copy of the foregoing pleading on all parties to this proceeding not registered for electronic service, by e-mailing, faxing, and/or mailing the same by United States mail, properly addressed and first-class postage prepaid.

/s/ Vanessa W. Anseman

Vanessa W. Anseman